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September 24, 2024

VIA ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 23A
New York, New York 10007

Re: *United States of America v. Menendez, et al.,*
Dkt. No. 23-cr-490-SHS

Dear Judge Stein:

As Your Honor is aware, this firm represents defendant Wael Hana in the above-captioned matter. We write to respectfully request that Mr. Hana be afforded the same extension of time that the Court allowed co-defendant Menendez this afternoon for his reply brief in further support of his post-trial motions pursuant to Federal Rules of Criminal Procedure 29 and 33. Those motions were filed on August 19, 2023, ECF Nos. 591, 593, and the Government's opposition was filed on September 18, 2024, ECF No. 611, making Mr. Hana's reply brief due on September 25, 2024, pursuant to Local Criminal Rule 49.1, but given the length of the submissions and the complexity of the issues, and although we have made a great deal of progress in drafting it, we respectfully request the same five-day extension to file a reply—that is, to September 30, 2024—as was allowed for Senator Menendez earlier today. ECF No. 619. For Mr. Hana too, this extension will not cause any delay to sentencing, which was adjourned to January 2025 yesterday, ECF No. 617, or for the post-trial motions, given the current due date set for co-defendant's reply.

Of course, if Your Honor has any questions or concerns with regard to this request, please do not hesitate to contact us. We thank the Court for its kind consideration of this matter.

Respectfully submitted,

s/ Lawrence S. Lustberg
Lawrence S. Lustberg

cc: All counsel of record (via ECF)